

EXHIBIT A

**SECOND CIRCUIT DECISIONS FOLLOWING
VEGA v. CM AND ASSOC. CONSTR. MGMT, LLC, 175 A.D. 3D 1144 (N.Y.
1ST DEPT. 2019)**

Decisions Denying Motions to Dismiss Claims Under NYLL § 191

Lipstein v. 20X Hospitality LLC d/b/a Spicy Moon,
No. 22 Civ. 4812 (JLR) (JW), 2023 WL 61240448 (S.D.N.Y. Sept. 19, 2023)

Davis v. Banana Republic,
No. 21 Civ. 6160 (KAM) (VMS), 2023 WL 5959597 (E.D.N.Y. Sept. 14, 2023)

Ramos v. Apple Inc.,
No. 22 Civ. 02761 (NSR), 2023 WL 5803739 (S.D.N.Y. Sept. 6, 2023)

Birthwright v. Advanced Stores Company, Inc.,
No. 22 Civ. 0593 (GRB) (ST), 2023 WL 5718633 (E.D.N.Y. Sept. 5, 2023)

Davis v. Banana Republic, LLC,
No. 21 Civ. 06160 (KAM) (VMS), 2023 WL 5152449 (E.D.N.Y. Jul. 31, 2023)

Freeland v. Findlay's Tall Timbers Distribution Center, LLC,
No. 22 Civ. 6415 (FPG), 2023 WL 4457911 (W.D.N.Y. Jul. 11, 2023)

Flores v. Cargill Inc.,
No. 23 Civ. 38 (DNH), 2023 WL 4199252 (N.D.N.Y. June 27, 2023)

Rankine v. Levi Strauss & Co.,
No. 22 Civ. 03362 (LTS) (DJS), 2023 WL 3582323 (S.D.N.Y. May 22, 2023)

Nunez v. Executive Le Soleil New York LLC,
22 Civ. 4262 (KPF), 2023 WL 3319613 (S.D.N.Y. Mar. 9 2023)

Bueno v. Buzinover,
No. 22 Civ. 2216 (PAE) (KHP), 2023 WL 2387113 (S.D.N.Y. Mar. 7 2023)

Petrosino v. Fastenal Company,
No. 22 Civ. 705 (MAD) (DJS), 2023 WL 3496362 (N.D.N.Y. Mar. 17, 2023)

Georgiou v. Harmon Stores, Inc.,
No. 22 Civ. 2861(BMC), 2023 WL 112805, (E.D.N.Y. Jan. 5, 2023)

Confusione v. Autozoners, LLC,
No. 21 Civ. 1 (JMA) (AYS), 2022 WL 17585879 (E.D.N.Y. Dec. 12, 2022)

Rosario v. Icon Burger Acquisition LLC,
No. 21 Civ. 4313 (JS) (ST), 2022 WL 17553319 (E.D.N.Y. Dec. 9, 2022)

Rath v. Jo-Ann Stores, LLC,
No. 21 Civ. 791S, 2022 WL 17324842 (W.D.N.Y. Nov. 29, 2022)

Levy v. Endeavor Air, Inc.,
No. 21 Civ. 4387 (ENV) (JRC), 2022 WL 16645829 (E.D.N.Y. Nov. 1, 2022)

Gordon v. Bluetriton Brands, Inc.,
No. 22 Civ. 02138 (JMF), Docket No. 43 (S.D.N.Y. Oct. 28, 2022)

Glaser v. Bath & Body Works, LLC,
No. 20 Civ. 02530 (WFK) (AYS) (E.D.N.Y. Sept. 28, 2022)

Jones v. Nike Retail Services, Inc.,
No. 22 Civ. 3343, 2022 WL 4007056 (E.D.N.Y. Aug. 30, 2022)

Gillett v. Zara USA, Inc.,
No. 20 Civ. 3734 (KPF), 2022 WL 3285275 (S.D.N.Y. Aug. 10, 2022)

Katz v. Equinox Holdings, Inc.,
No. 20 Civ. 9856 (VEC), 2022 WL 1292262 (S.D.N.Y. Apr. 29, 2022)

Mabe v. Wal-Mart Associates, Inc.,
No. 20 Civ. 00591, 2022 WL 874311 (N.D.N.Y. Mar. 24, 2022);

Caul v. Petco Animal Supplies, Inc.,
No. 20 Civ. 03534 (RPK)(SJB), 2021 WL 4407856 (E.D.N.Y. Sept. 27, 2021)

Rodrigue v. Lowe's Home Centers, LLC,
No. 21 Civ. 01127 (RPK)(RLM), 2021 WL 3848268 (E.D.N.Y. Aug. 27, 2021)

Beh v. Community Care Companions Inc.,
No. 19 Civ. 1417(JLS)(HBS), 2021 WL 3914297 (W.D.N.Y. Feb. 1, 2021)

Sorto v. Diversified Maint. Syst., LLC, No. 20 Civ. 1302 (JS)(SIL), 2020 WL 7693108 (E.D.N.Y. Dec. 28, 2020)

Quintanilla v. Kabco Pharmaceuticals,
No. 19 Civ. 6752 (PKC)(CLP), Doc. No. 18 (E.D.N.Y., Apr. 17, 2020)

Sarit v. Westside Tomato, Inc.,
No. 18 Civ. 11524 (RA), 2020 WL 1891983 (S.D.N.Y. Apr. 16, 2020)

Duvernay v. Hercules Medical P.C.,
No. 18 Civ. 7652 (DLC), 2020 WL 1033048 (S.D.N.Y. Mar. 3, 2020)

Scott v. Whole Foods Group, Inc.,
No. 18 Civ. 0086, 2020 WL 9814095 (E.D.N.Y. Feb. 5, 2020)

Decisions Denying Interlocutory Appeal of Motions To Dismiss NYLL § 191 Claims

Miner-Vargas v. Wal-Mart Associates, Inc.,

No. 20 Civ. 591 (TJM) (CFH), Docket No. 58 (N.D.N.Y. Mar 23, 2023).

Rath v. Jo-Ann Stores, LLC,

No. 21 Civ. 791S, ECF No. 34 (W.D.N.Y. Dec. 13, 2022)

Caul v. Petco Animal Supplies, Inc.,

No. 20 Civ. 3534 (RPK) (SJB), 2021 WL 6805889 (E.D.N.Y. Dec. 22, 2021)

Caccavale v. Hewlett Packard, No. 20 Civ. 974 (GRB) (JMW), Minute Entry Dated Feb. 2, 2021 (E.D.N.Y.)